

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

GEOTAG, INC.,

Plaintiff,

vs.

**INTERNATIONAL BUSINESS
MACHINES, *et al.*,**

Defendants.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 2:13-cv-00062

JURY TRIAL DEMANDED

**STIPULATED MOTION FOR DISMISSAL WITH PREJUDICE
OF DEFENDANT INTERNATIONAL BUSINESS MACHINES CORPORATION**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i) and (a)(2), Plaintiff GeoTag, Inc. ("GeoTag") hereby seeks from the Court and moves for dismissal WITH PREJUDICE of all claims asserted by GeoTag against International Business Machines Corporation, including d/b/a Kenexa (collectively "IBM"). Each Party shall bear its own costs, expenses and attorneys' fees.

DATED: April 29, 2013

Respectfully submitted,

/s/ Craig Tadlock

By: Craig Tadlock
Texas State Bar No. 00791766
Keith Smiley
Texas State Bar No. 24067869
Tadlock Law Firm
2701 Dallas Parkway, Suite 360
Plano, Texas 75093
Telephone: (903) 730-6789
e-mail: craig@tadlocklawfirm.com
keith@tadlocklawfirm.com

David R. Bennett
Direction IP Law
P.O. Box 14184

Chicago, IL 60614-0184
Telephone: (312) 291-1667
e-mail: dbennett@directionip.com

Daniel Mount
Kevin Pasquinelli
Mount Spelman & Fingerman, PC
333 West San Carlos Street
Riverpark Tower, Suite 1650
San Jose, CA 95110
Telephone: (408) 279-7000
e-mail: dan@mount.com
kpasquinelli@mount.com

**ATTORNEYS FOR PLAINTIFF
GEOTAG, INC.**

Respectfully submitted,

/s/ Eric M. Albritton (with permission)

Eric M. Albritton
Texas State Bar No. 00790215
ema@emafirm.com
ALBRITTON LAW FIRM
P.O. Box 2649
Longview, Texas 75606
Telephone: (903) 757-8449
Facsimile: (903) 758-7397

***Counsel for International Business
Machines Corp.***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on April 29, 2013 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Craig Tadlock
Craig Tadlock